

EXHIBIT C

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF INGRID ALLEYNE-ROBERTSON

I, Ingrid Alleyne-Robertson, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present in Tower Two when the terrorist attacks of the World Trade Center Towers occurred.

4. I was employed as a Technical Associate/Client Specialist at AON Corp. That day, I arrived at work on the 99th floor at 6:45 A.M.

5. I was in New York City at Ground Zero when the plane(s) hit the towers and I received physical injuries in the escape and collapse. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be

compared to a war zone. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever.

6. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: I have sustained a back injury and post-traumatic stress disorder. Specifically, I have been diagnosed with L5-S1 disc herniation, bulging discs at L3-L4 and L4-L5, mild narrowing of the L5-S1 disc space, straightening of the normal curvature of the lumbosacral spine, and desiccation of the L4-L5 disc space. Because of these injuries, I have lower back pain which radiates down my right leg for which I have received several Epidural injections and I wear a back brace. I am unable to sit or stand for long periods of time. Sometimes I walk with a cane. I was found to be partially disabled, and I still suffer from back pain and post-traumatic stress disorder.

7. On September 11, 2001 at around 8:35 A.M., I went to the restroom, and when I returned to my desk, I heard a loud “boom.” My co-workers and I were not sure what the loud noise was and we spent approximately ten minutes trying to find the source and debating whether or not to leave. A few co-workers and I decided to exit the building via the stairwell, despite being told to remain at our desks.

When I reached the 67th floor, I heard another “boom” and felt the vibration of what I later learned was United Airlines Flight 175 hitting Tower Two. The impact threw me across the stairwell onto my back. When I looked up, I noticed there was a large crack in the building. At that point, I knew something was really wrong, and panic sunk in. We began running down the stairs, and I fell down the stairs, backwards onto my back. I felt the pain, but I knew I had to get out of the building, so I pressed on down the 66 flights of stairs that followed. As we were trying to leave the building, I recall being told that we should go back upstairs.

When I reached the lobby, I remember seeing broken glass and water on the ground. I later realized that the towers had been hit by planes and that it was a terrorist attack. I ran out of the building with my shoes in my hands. I ran along Nassau Street and up Park Row. I stopped near J&R Store on Park Row, where a firefighter helped me put my shoes on to protect my feet from the glass and debris on the ground. Seconds later, I heard a loud, horrific rumbling noise, and the sky turned black. It was Tower Two collapsing. We all started running for our lives, but in the darkness and choking dust I either ran into or was knocked into a wall. I did not walk over the Brooklyn Bridge to my home because I feared that bridges, public transport, or tunnels would be attacked next.

Because of this experience, I am incredibly fearful of enclosed spaces, public transportation, and sky scrapers. I refuse to take trains and I do not like to be alone. I am still fearful of flying. When my brother passed away, I was unable to attend because I was fearful of panic attacks and PTSD while flying. When I am in an enclosed space, I must be near the door, and I will not live higher than the second floor of a building. For weeks and months following the attack, I had an incredibly difficult time leaving my home. I tried to return to work after September 11th, but I could not concentrate because I was fearful of public transportation and being inside an office building. In approximately early 2002, there was a bomb scare in the building at AON Corp., at which time we were evacuated, and I was immediately reminded of the traumatizing experience of September 11th. The horrific nature of the events I endured on September 11th continue to impact my daily life even after eighteen years. I am constantly reminded of this event every year when the ceremonies are held in New York.

8. I sought medical attention for my injuries following September 11th. I continue to seek treatment for my back injuries and post-traumatic stress disorder. Attached as Exhibit B to

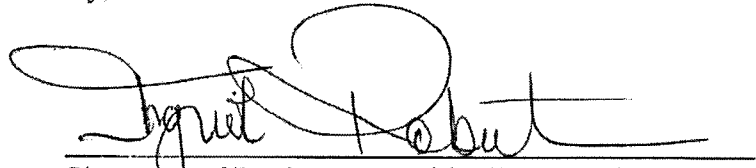
this Declaration is a true and correct copy of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

9. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to the traumatic events of these terrorist attacks.

10. I previously pursued a claim (Claim Number VCF 212-003255) through the September 11th Victim Compensation Fund specifically related to the physical injuries I sustained on September 11, 2001, and my claim was determined to be ineligible for compensation because I was not treated within 72 hours of the attack. However, I was in shock immediately following September 11th and I was also fearful of additional attacks. Because of this, I did not even go home to Brooklyn until September 12th. Additionally, I was (and I remain) incredibly fearful of leaving my home and of taking public transportation. I called my physician on Friday, September 14, 2001—within seventy-two hours of the attacks—in an effort to obtain an appointment, but I was not able to secure an appointment until Monday, September 17, 2001.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 27th day of January, 2020



Signature of Declarant, Ingrid Alleyne-Robertson

Exhibits Filed Under Seal